

Exhibit A

**CEC LLC Amended Application Form for a Certificate
to Become A Telecommunications Carrier**

(File Original and 3 copies)

**AMENDED APPLICATION FOR CERTIFICATE TO BECOME A
TELECOMMUNICATIONS CARRIER**

V. GENERAL

1. Applicant's Name(including d/b/a, if any) FEIN # 13 398 4646

Con Edison Communications, LLC

Address: Street 132 West 31st Street, 13th Floor

City New York State/Zip New York 10001

2. Authority Requested: (Mark all that apply) ☒ 13-403 ☒ 13-404 ☒ 13-405

3. Request for waivers/variances: In applications for exchange service authority under Sections 13-404 or 13-405, waivers of Part 710 and of Section 735.180 of Part 735 are generally requested. In applications for interexchange service authority under Sections 13-403 and 13-404, waivers of Part 710 and Part 735 are generally requested. Please indicate which waivers Applicant is requesting and explain why Applicant is requesting each waiver/variance.

<input checked="" type="checkbox"/> Part 710	Uniform System of Accounts for Telecommunications Carriers
<input checked="" type="checkbox"/> Part 735	Procedures Governing the Establishment of Credit, Billing, Deposits, Termination of Service and Issuance of Telephone Directories for Local Exchange Telecommunications Carriers in the State of Illinois
<input checked="" type="checkbox"/> Section 735.180	Directories
<input checked="" type="checkbox"/> Other	

Applicant also requests authorization to maintain its books and records outside the State of Illinois at its principal place of business in the State of New York, pursuant to 83 Ill. Admin. Code Part 250.

Initially, Applicant will not offer circuit-switched voice services. Therefore, Applicant requests waiver of 83 Illinois Administrative Code Parts 720, 725, 755, 756, 757, and 772 until such time that CECI offers circuit-switched voice services within Illinois.

4. For all applicants requesting local exchange authority under Section 13-404 or Section 13- 405, please complete the following:

- (a) the Standard Questions for Applicants Seeking Local Exchange Service Authority found in Appendix A of this document; and
- (b) the 9-1-1 Questions for Applicants Seeking Local Exchange Service Authority found in Appendix B of this document; and
- (c) the Financial Questions for Applicants Seeking Local Exchange Authority found in Appendix C of this document; and
- (d) if applicable, the Prepaid Service Questions for Applicants Seeking Local Exchange Service Authority found in Appendix D of this document.

Please see Appendices A, B, and C of this Application Form. Question 4(d) does not apply to Applicant.

5. In what area of the state does the Applicant propose to provide service?

Applicant seeks authority to provide telecommunications service throughout the State of Illinois. Applicant seeks statewide authority so that it may expand its operations as market conditions warrant and as such areas become open to competition. Applicant currently does not plan to provide local exchange services in the service areas of any exempt small or rural incumbent local exchange carriers as defined by the Telecommunications Act of 1996.

6. Please attach a sheet designating contact persons to work with Staff on the following:

- a) issues related to processing this application
- b) consumer issues
- c) customer complaint resolution
- d) technical and service quality issues
- e) "tariff" and pricing issues
- f) 9-1-1 issues
- g) security/law enforcement

Please identify each contact person's (i) name, (ii) title, (iii) mailing address, (iv) telephone number, (v) facsimile number, and (vi) e-mail address, if any.

Please see Exhibit B of Application.

7. Please check type of organization?

☐ Individual ☐ Corporation
☐ Partnership Date corporation was formed _____
In what state? New York
☒ Other (Limited Liability Company)

8. Submit a copy of articles of incorporation and a copy of certificate of authority to transact business in Illinois.

Please see Exhibit C of Application, which includes a copy of Applicant's articles of organization and Applicant's application for a certificate of authority to transact business in the State of Illinois.

9. List jurisdictions in which Applicant is offering service(s).

Applicant currently holds no permits, licenses, or certificates to provide telecommunications services in any state.

10. Has the Applicant, or any principal in Applicant, been denied a Certificate of Service or had its certification revoked or suspended in any jurisdiction in this or another name?

☐ YES (Please provide details) ☒ NO

11. Have there been any complaints or judgements levied against the Applicant in any other jurisdiction?

____ YES X NO

If YES, describe fully. _____

12. Has Applicant provided service under any other name?

____ YES X NO

If YES, please list.

13. Will the Applicant keep its books and records in Illinois? ____ YES X NO
If NO, permission pursuant to 83 Ill. Adm Code Part 250 needs to be requested.

Applicant requests authorization to maintain its books and records at its principal place of business in the State of New York, pursuant to 83 Ill. Admin. Code part 250.

MANAGERIAL

14. Please attach evidence of the applicant's managerial and technical resources and ability to provide service. This may be in either narrative form, resumes of key personnel, or a combination of these forms.

Please see Section III of Application and Exhibit D attached to Application.

15. List officers of Applicant.

Peter A. Rust
Lawrence Linkens
Felipe J. Alvarez
John F. Pinto
Christopher J. Metaxas
David W. Robinson, Esq.

Chief Executive Officer and President
V.P. Operations
Chief Operating Officer
V.P. Engineering and Construction
V.P. Business Development
V.P. General Counsel

Directors:

William Longhi
Robert P. Shelben
John Nutant
Kathy A. Perone

16. Does any officer of Applicant have an ownership or other interest in any other entity which has provided or is currently providing telecommunications services? ____ YES X NO

If YES, list entity. _____

17. How will Applicant bill for its service(s)? (At a minimum, describe how often the Applicant will bill for services and details of the billings statement.)

Applicant will bill directly for its services.

18. How does Applicant propose to handle service, billing, and repair complaints? (At a minimum, describe Applicant's internal process for complaint resolution, the complaint escalation process, the timeframe and process by which the customer is notified by Applicant that they may seek assistance from the Commission?)

Applicant is a competitive access provider and will not provide voice services to end users. However, Applicant will maintain a toll-free, customer service number (877/Ringfiber or 877/746-4342) that its customers may call to register service, billing and repair complaints or inquiries. Customers may also send written complaints and inquiries to Applicant at 132 West 31st Street, 13th Floor, New York, New York 10001. Applicant views customer satisfaction as critical to its success in the competitive marketplace and will address all service, billing, and repair complaints and inquiries promptly. If Applicant is unable to resolve a complaint to a customer's satisfaction, Applicant will advise the customer of his or her right to file a complaint with the Illinois Commerce Commission.

19. Will personnel be available at applicant's business office during regular working hours to respond to inquiries about service or billing? X YES NO

20. What telephone number(s) would a customer use to contact your company?

Customers with billing questions or complaints may reach Applicant at its toll-free number (877/Ringfiber or 877/746-4342).

21. Will applicant abide by all Federal and State slamming and cramming laws pursuant to Section 13-902 of the Public Utilities Act and Section 258 of the 1996 Telecommunications Act?

 X YES NO

22. Please describe applicant's procedures to prevent slamming and cramming of customers.

Applicant is a competitive access provider and will not provide end user services. At such time as Applicant does provide end user service, it will comply with applicable Illinois law as well as Federal Communications Commission regulations regarding how interexchange carriers may change a consumer's Primary Interexchange Carrier ("PIC"). Applicant will also comply with the FCC's regulations regarding how carriers may change a consumer's primary local exchange provider. Applicant will follow the "zero-tolerance" slamming/cramming policy which has been established and that all employees that interface with customers in the sales and ordering processes are required to execute.

23. If granted authority to operate as a local exchange carrier, will the applicant abide by the following 83 Illinois Administrative Code Parts: 705, 710, 720, 725, 735, 755, 756, 757, 770, and 772?

 X YES NO (If no, please provide an explanation.)

Applicant will abide by all of the above-referenced Illinois Administrative Code Parts except those from which it seeks a waiver in this Application. Please see response to Question 3 above.

24. Is Applicant aware that it must file tariffs prior to providing service in Illinois?

 X YES NO

FINANCIAL

25. Please attach evidence of applicant's financial fitness through the submission of its most current income statement and balance sheet, or other appropriate documentation of applicant's financial resources and ability to provide service.

The Commission has previously reviewed and approved the financial qualifications of CECI. CEC LLC is simply assuming these Illinois operations and this is not a new entity with unproven financial qualifications. Accordingly, CEC LLC respectfully requests the Commission incorporate CECI's prior performance, including CEC's previously submitted financial statements, as reasonable proxy for CEC LLC's income statement and balance sheet. At the Commission's request, CEC LLC can supplement this Application with another copy of its income statement and balance sheet.

TECHNICAL

26. Does Applicant utilize its own equipment and/or facilities? ☒ YES ☐ NO

If YES, please list:

Initially, Applicant plans to offer services through a combination of purchased and leased assets. Applicant intends to construct a facilities-based dedicated and private line fiber optic communications infrastructure. The infrastructure will be enabled with the latest generation of integrated optical networking equipment that provides access, multiplexing, switching, and transport.

If NO, which facility provider(s)'s services does Applicant use?

27. Please describe the nature of service to be provided (e.g., operator services, Internet, debit cards, long distance service, local service).

Applicant requests authority to provide all forms of telecommunications services throughout the State of Illinois. Applicant does not expect to deviate from the ILEC's local service areas unless and until the Commission revises its rules on local calling scope. Applicant's services will be available on a full time basis, 24 hours a day, seven days a week.

Applicant intends to construct a facilities-based dedicated and private line, fiber optic communications infrastructure capable of delivering survivable, secure, maximum-quality transport services. Applicant's network will utilize state-of-the-art fiber optic facilities running over top-grade cabling capable of supporting Dense Wavelength Division Multiplexing ("DWDM"), multiple self-healing SONET rings with diversely routed fiber paths, and interconnection with specialized survivability features and options. The fiber optic infrastructure is a reliable, high-performance network backbone that can survive and reroute around fiber cuts, facility problems, and equipment failures. Applicant believes that the advanced technical characteristics of its network will allow it to provide the high levels of reliability, security, and efficiency that its target customers typically demand.

Applicant will continuously monitor and maintain a high level of control over its network on a 24-hour basis through its network operations center. Applicant's network is capable of using the highest commercially available capacity transmission (OC-192) and beyond. All its services ride on a DWDM and SONET based backbone network designed to maximize reliability and survivability.

Initially, Applicant will lease the fiber optic facilities of other carriers while its own facilities are being built. As the Applicant completes the build-out of its network, the Applicant will move this traffic onto its own network.

Applicant does not currently own any facilities in the State of Illinois, including switches, in connection with or to facilitate communication by telephone. Prior to constructing facilities in Illinois, the Applicant will provide a description of the Illinois facilities to be constructed.

28. Will technical personnel be available at all times to assist customers with service problems?

☒ YES ☐ NO

29. If Applicant intends to provide payphone service, will the equipment utilized comply with FCC requirements and Finding (9) of the Commission Order entered in Docket No. 84-0442 on June 11, 1986, including, but not limited to: (a) touch dialing; (b) access to 9-1-1 and "0" operator dialing without use of a coin; (c) rules governing use of payphones by disabled persons; (d) ability to complete local and long-distance calls; (e) unlimited duration for local calls; and (f) a message explaining the telephone's general operations, dialing

instructions for emergency assistance, payphone owner's name, method of reporting service problems and method of receiving credit for faulty calls?

_____ YES _____ NO

Not Applicable since Applicant does not intend to provide payphone service.



(Signature of Applicant)

VERIFICATION

This application shall be verified under oath.

OATH

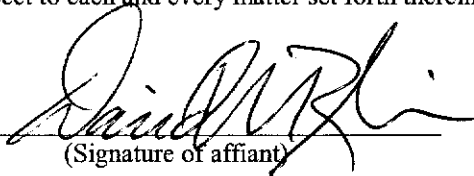
State of New York)
)ss
County of New York)

David W. Robinson makes oath and says that he is General Counsel

of

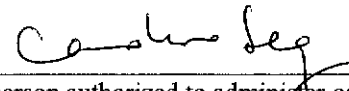
Con Edison Communications, LLC

that he has examined the foregoing application and that to the best of his knowledge, information, and belief, all statements of fact contained in the said application are true, and the said application is a correct statement of the business and affairs of the above-named applicant in respect to each and every matter set forth therein.


(Signature of affiant)

Subscribed and sworn to before me, a Notary Public/ Carolina Seguin
(Title of person authorized to administer oaths)

in the State and County above named, this 20th day of march, 2002


(Signature of person authorized to administer oath)

Carolina Seguin
Notary Public, State of New York
Registration #01SE6043877
Qualified in Queens County
My Commission Expires June 26, 2007

Standard Questions for Applicants Seeking Local Exchange Authority

1. Is your company seeking any waivers or variances of certain Commission rules and regulations in this proceeding that pertain to local exchange service? Please provide evidence as to why your company is seeking any waiver or variance.

Yes. Applicant is seeking standard waivers of 83 Illinois Administrative Code Parts 710 and 735.180 for local exchange authority and Part 735 for interexchange authority. Applicant is seeking waivers of 83 Illinois Administrative Code Parts 250, 720, 725, 755, 756, 757 and 772. Applicant seeks these waivers because initially Applicant will not provide circuit-switched voice services. Such waivers would remain in effect only until Applicant initiates the provision of voice services. Applicant also requests authorization to maintain its books and records at its principal place of business in the State of Illinois, pursuant to 83 Illinois Administrative Code Part 250.

2. Will your company comply with 83 Illinois Administrative Code Part 772, Pay-Per-Call Services, including Part 772.55(a)(1), Billing and Part 772.100(d) Notices?

To the extent that Applicant offers voice services in the future, it will comply with 83 Illinois Administrative Code Part 772.

3. Will your company comply with 83 Illinois Administrative Code Part 705, Preservation of Records of Telephone Utilities?

Yes. Applicant will comply with 83 Illinois Administrative Code Part 705, Preservation of Records of Telephone Utilities.

4. Will your company abide by 83 Illinois Administrative Code Part 735, "Procedures Governing the Establishment of Credit, Billing, Deposits, Termination of Service and Issuance of Telephone Directories for Telephone Utilities in the State of Illinois"?

To the extent that Applicant offers voice services in the future, it will comply with 83 Illinois Administrative Code Part 735.

5. Who will provide customer repair service for your company?

During the time that Applicant is establishing its operations in Illinois, it will be contracting with third parties not yet determined to provide customer repair service.

6. How many people does the company employ?

Applicant currently employs approximately 90 people and anticipates hiring up to 200 people.

7. Will your company meet the requirements as they pertain to the Telephone Assistance Programs imposed by Sections 13.301 and 13.301.1 of the Illinois Public Utilities Act and 83 Illinois Administrative Code Part 757?

To the extent that Applicant offers voice services in the future, it will comply with Sections 13.301 and 13.301.1 of the Illinois Public Utilities Act and 83 Illinois Administrative Code Part 735.

8. Will your company solicit, collect, and remit the voluntary contributions from its telephone subscribers to support the Telephone Assistance Programs?

To the extent that the Commission determines that universal service requirements are applicable to Applicant, Applicant will abide by those rules.

9. Does your company plan on filing to become an Eligible Telecommunications Carrier?

No. Applicant does not plan on filing to become an Eligible Telecommunications Carrier.

10. Does the company realize that it will not be able to receive any of the federal reimbursements for the Lifeline and Link Up Programs if it is not an eligible carrier?

Yes. Applicant realizes that it will not be able to receive any of the federal reimbursements for the Lifeline and Link Up Programs if it is not an eligible carrier.

11. Will your company offer all of the waivers associated with the Universal Telephone Service Assistance Programs (UTSAP)?

To the extent that the Commission deems that universal service requirements apply to the Applicant's services, Applicant will comply with the applicable rules and will offer all of the waivers associated with UTSAP.

12. Will your company abide by the regulations as prescribed in 83 Illinois Administrative Code Part 755, "Telecommunications Access for Persons with Disabilities," 83 Illinois Administrative Code Part 756 "Telecommunications Relay Service," and Sections 13-703 of the Illinois Public Utilities Act?

To the extent that Applicant offers voice services in the future, it will comply with 83 Illinois Administrative Code Parts 755 and 756 and Sections 13-703 of the Illinois Public Utilities Act.

13. Will the company's billing system be able to distinguish between resale and facilities based service for the collection of the ITAC line charge?

Yes. Applicant's billing system will be able to distinguish between resale and facilities based service for the collection of the ITAC line charge.

14. Has your company signed and returned the Universal Telephone Assistance Corporation ("UTAC") and the Illinois Telecommunications Access Corporation ("ITAC") to Commission staff?

Applicant is filing its UTAC and ITAC forms concurrently with this Application Form. Please see Exhibit E to the Application.

15. How does your company plan to solicit customers once it begins to provide local service?

Applicant will market its services through a combination of print media and point of presence advertising in markets where Applicant provides services. Applicant does not currently intend to engage in telemarketing or multi-level marketing.

16. Has your company provided service under any other name?

Applicant has not provided telecommunications service in the State of Illinois under any other name.

17. Have any complaints or judgments been levied against the company? (Instate, out-of-state, or FCC).

No complaints or judgments have been levied against Applicant instate, out-of-state or with the FCC.

9-1-1 Questions for Applicants Seeking Local Exchange Service Authority

1. Will your company ensure that 911 traffic is handled in accordance with the 83 Illinois Administrative Code Part 725 and the Emergency Telephone System Act?

To the extent that Applicant offers voice services in the future, Applicant will ensure that 911 traffic is handled in accordance with the 83 Illinois Administrative Code Part 725 and the Emergency Telephone System Act.

2. Will your company contact and establish a working relationship with the 911 systems when you begin to provide local telephone service?

Applicant will contact and establish a working relationship with the 911 systems when it begins to provide local telephone service in the future.

3. Will your company coordinate with the incumbent LEC(s) and local 911 systems to provide transparent service for your local exchange customers?

To the extent that Applicant offers voice services in the future, Applicant will coordinate with the incumbent LEC(s) and local 911 systems to provide transparent service for its local exchange customers.

4. Who will be responsible for building and maintaining the 911 database for your local exchange customers?

The person responsible for building and maintaining the 911 database will be determined at such time as Applicant offers voice services in the future.

5. How often will your company update the 911 database with customer information?

To the extent that Applicant offers voice services in the future, Applicant will update the 911 database on a daily basis in accordance with Illinois statute, rules and regulations.

6. Will your company's billing system have the ability to distinguish between facilities based and resale for the collection of the 911 surcharge?

To the extent that Applicant offers voice services in the future, Applicant's billing system will have the ability to distinguish between facilities based and resale for the collection of the 911 surcharge.

7. Does your company have procedures for the transitioning of the 911 surcharge collection and disbursement to the local 911 system?

At this time Applicant does not have procedures for the transitioning of the 911 surcharge collection and disbursement to the local 911 system. To the extent Applicant offers voice services in the future, Applicant will have procedures for the transitioning of the 911 surcharge collection and disbursement to the local 911 system.

8. Will your company's proposal require any network changes to any of the 911 systems?

No. Applicant's proposal does not require any network changes to any of the 911 systems.

9. Will your company be able to meet the requirements specified under Part 725.500(o) and 725.620(b) for the installation of call boxes?

To the extent that Applicant offers voice services in the future, Applicant will meet the requirements specified under Part 725.500(o) and 725.620(b) for the installation of call boxes.

10. Does your company plan to file for a waiver of Part 725.500(o) and 725.620(b) in the future?

Applicant has requested a waiver of Part 725 which encompasses all sections of Part 725. Please see response to General Question 3 in Applicant's Application Form.

Financial Questions for Applicants Seeking Local Exchange Service Authority

1. (Answer if requesting waiver of Part 710) What circumstances warrant a departure from the prescribed Uniform System of Accounts ("USOA")?

Part 710 requires compliance with the Uniform System of Accounts ("USOA"). While this provision is appropriately applied to incumbent LECs that have market power, it imposes unnecessary and burdensome requirements on new entrants that are inconsistent with a competitive environment. Applicant's size and lack of market power are special circumstance that warrant a waiver of the USOA requirement. Applicant keeps its books in accordance with Generally Accepted Accounting Principles ("GAAP"), which will result in a substantially equivalent portrayal of its operating results and financial condition as the USOA and will maintain uniformity in the substantive results as among telecommunications companies.

2. Will records be maintained in accordance with Generally Accepted Accounting Principles ("GAAP")?

Yes. Applicant will maintain its records in accordance with Generally Accepted Accounting Principles ("GAAP").

3. Will applicants accounting system provide an equivalent portrayal of operating results and financial condition as the USOA?

Yes. Applicant's accounting system will provide an equivalent portrayal of operating results and financial condition as the USOA.

4. Will applicants accounting procedures maintain or improve uniformity in substantive results as among similar telecommunications companies?

Yes. As it is Applicant's understanding that the Commission has waived Part 710 for other competitive carriers which keep their books in accordance with GAAP, Applicant's application of GAAP will result in a substantially equivalent portrayal of its operating results and financial condition as the USOA and will maintain uniformity in the substantive results as among telecommunications companies.

5. Will applicant maintain its records in sufficient detail to facilitate the calculation of all applicable taxes?

Yes. Applicant will maintain its records in sufficient detail to facilitate the calculation of all applicable taxes.

6. Does the accounting system currently in use by applicant provide sufficiently detailed data for the preparation of Illinois Gross Receipts Tax returns? What specific accounts or sub-accounts provide this data?

Yes. Applicant's current accounting system provides sufficiently detailed data for the preparation of Illinois Gross Receipts Tax returns. The Commission has previously reviewed and approved the financial qualifications of CECI. CEC LLC is simply assuming those Illinois operations and this is not a new entity with unproven financial qualifications. Accordingly, CEC LLC respectfully requests the Commission incorporate CECI's prior performance, including CEC's previously submitted chart of accounts as reasonable proxy for CEC LLC's chart of accounts. At the Commission's request, CEC LLC can supplement this Application with another copy of its chart of accounts.

7. If a waiver of Part 710 is granted, will applicant provide annual audited statements or all periods subsequent to granting of the waiver?

Yes. If a waiver of Part 710 is granted, Applicant will provide annual audited statements for all periods subsequent to granting of the waiver.

8. Does applicant agree that the requested waiver of Part 710 will not excuse it from compliance with future Commission rules or amendments to Part 710 otherwise applicable to the Company?

Yes. Applicant agrees that the requested waiver of Part 710 will not excuse it from compliance with future Commission rules or amendments to Part 710 otherwise applicable to Applicant.

9. Please attach a copy of applicant's chart of accounts.

See response to Financial Question 7 above.

Prepaid Service Questions for Applicants Seeking Local Exchange Service Authority

Applicant will not provide prepaid service. Therefore, Applicant does not provide specific responses to the questions set forth in Appendix D.

1. Will customers have the ability to sign up with any long distance company they choose?
Not applicable.
2. Will customers have the ability to use dial around long distance companies?
Not applicable.
3. Does the applicant have interexchange authority in Illinois? If yes, please provide the docket number.
Not applicable.
4. Will customers have access to the Illinois Relay Service?
Not applicable.
5. Will customers be able to make 1-800 calls for free?
Not applicable.
6. Will the Company offer operator services?
Not applicable.
7. Please describe how applicant plans to collect the monthly fee to be paid in advance.
Not applicable.
8. Will customers' monthly bills show a breakdown of services, features, surcharges, taxes, etc.?
Not applicable.
9. Will customers pay an installation fee? If yes, will payment arrangements be offered for the installation fee?
Not applicable.
10. Will telephone service be in the Company's name or the customer's name. If in the Company's name how will information appear in data bases, such as 9-1-1, directory assistance, etc.?
Not applicable.
11. Will applicant offer prepaid service as a monthly service or as a usage service?
Not applicable.
12. Will applicant provide a warning when the remaining value of service is about to cease?
Not applicable.

13. Is the customer given more than one notice of the remaining value of service?

Not applicable.

14. How much advance notice is given to the customer of the remaining value of service?

Not applicable.

15. If the customer is in the middle of a call, will they be disconnected when the remaining value of service has expired?

Not applicable.

16. Has the customer been made aware of potentially being disconnected during a call when the remaining value of service expires?

Not applicable.

17. When does the timing of a call start?

Not applicable.

18. If the person called does not answer, is any time deducted from the customer's account?

Not applicable.

19. Will there be any other instances in which the Company would disconnect a customer, other than running out of prepaid time?

Not applicable.

20. When a customer runs out of time is their phone immediately disconnected or on suspension? (Will they still be able to receive calls?)

Not applicable.

21. Are applicant's services available to TTY callers?

Not applicable.

22. How will the applicant handle a complaint from a customer who disputes the amount of time used or remaining?

Not applicable.

23. The Public Utilities Act requires a local calling area that has no time or duration charges. How will the Company define each customer's untimed local calling area?

Not applicable.